



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MSA/MEB  
F. #2016R00695

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 6, 2019

By Hand

The Honorable William F. Kuntz, II  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Jean Boustani, et al.  
Criminal Docket No. 18-681 (WFK)

Dear Judge Kuntz:

The government respectfully submits this letter to request that the Court order unsealing of the above-captioned partially sealed indictment in this case, the related arrest warrants and the entire docket so that information regarding all of the defendants will be publicly available. Five defendants in the case have been arrested pursuant to the United States' charges, and government believes that all of the remaining defendants are aware of the United States' charges against them, and thus, the charges no longer need to be sealed. In addition, Boustani's counsel has requested an unredacted copy of the indictment as part of his pre-trial preparation, and the government plans to present evidence at trial related to Boustani and all of his co-defendants. Accordingly, the government seeks to unseal the indictment, the related arrest warrants and the docket as to all defendants in this case.

Respectfully submitted,

**RICHARD P. DONOGHUE**  
United States Attorney

By:                     /s/                      
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Enclosure